

SANTA MONICA MOUNTAINS CONSERVANCY

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Los Angeles County Regional Planning Department
Impact Analysis Section
320 West Temple Street, Room 1348
Los Angeles, California 90012

Notice of Preparation of a Draft Environmental Impact Report Comments
Skyline Ranch Project
Tentative Tract Map No. 060922

Dear Dr. Chen:

The proposed project is located in the upper Santa Clara River watershed, which contains regionally significant ecological, recreational and visual resources. The project site includes the biologically sensitive and significant Cruzan Mesa. Located on the mesa is a vernal pool complex that supports numerous endangered and sensitive species. The vernal pool system is a sensitive, regional resource that must be protected.

Community Facilities District

The land that is to become open space, as identified in the Notice of Preparation (NOP), is a regionally significant resource. Good stewardship must be provided for this open space. A resource management agency that can adequately protect the resources on the property is the only entity that the open space should be dedicated to. The Conservancy's joint powers entity, the Mountains Recreation and Conservation Authority (MRCA), is able to take title to the open space and manage it in a protective capacity.

In order to guarantee the safety of the public visiting the open space dedication and of the new adjoining homeowners, as well as the ecological integrity of the open space, another critical mitigation measure that must be included in the DEIR is a permanent funding mechanism to maintain the property. Dedication of land is only a complete mitigation measure if funding is provided. To our knowledge, a Community Facilities District (CFD) is the optimal method for such a funding source.

A minimum of \$35,000 per year with an inflation adjuster must be provided for maintenance of the open space. The open space recipient, such as the MRCA, would be the

beneficiary of the money generated by the CFD each year. The \$35,000 would fund two half-day visits to the site per week throughout the year. The money would also fund the maintenance of signage, trails, fencing, protection of the vernal pools, the cleanup of trash, and provide for public safety. The first increment of the CFD must be provided simultaneously with the transfer of the open space. If the resource management agency were to provide brushing on the project site as well, then \$40,000 per year must be provided by the CFD.

In addition to the money raised annually by the CFD, the resource management agency must be provided with a minimum of \$20,000 for initial site improvements. This money for initial site improvements must be provided simultaneously with the transfer of the open space. The improvements to the site would include gates, fencing, and signage.

Mitigation Measures

The DEIR must include two mitigation measures. The project site and in particular Cruzan Mesa, where the vernal pools are located, has been significantly degraded. This degradation was caused by continual discing of the land surrounding each vernal pool, as well as the filming and grazing activities allowed on the mesa. To mitigate these impacts, the DEIR must include the following measure. All filming and grazing uses not recommended by Los Angeles County biologists be removed from the project site, no more than 60 days after project approval.

To help educate the public about the significant biological resources found on Cruzan Mesa, the DEIR must include the following mitigation measure. The project applicant will provide one-time funding totaling \$25,000 to the open space recipient to prepare educational kiosks about the vernal pool ecosystem prior to map recordation or the issuance of grading permits.

Restoration of the Vernal Pool Complex

The biological integrity of the vernal pool ecosystem must be restored. As stated in the above section, the site has been significantly degraded by the uses in that area of the project site. To adequately restore the vernal pool system, a restoration plan must developed. This plan must be approved by Los Angeles County biologists prior to EIR certification. A minimum of \$500,000 must be provided to the resource management agency to administer the plan and restore the vernal pools. The restoration fund must be in an escrow account 30 days prior to map recordation or the issuance of a grading permit.

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Growth Inducing Impacts

Two inholdings are located in the eastern side of the project site. The DEIR must describe what type of access will be provided to these inholdings. All future environmental impacts must be described. One of the parcels is located within the Cruzan Mesa Significant Ecological Area. To remove any potential for growth inducing impacts, the applicant should buy out the inholdings and include them as part of the open space dedication.

Mint Canyon Creek

The Conservancy is pleased that the project footprint was completely moved off of the mesa. However, the majority of Mint Canyon Creek and its tributaries on the project site will be totally filled in. Mint Canyon Creek is a significant biological resource and must be protected. The footprint should be altered so that the creek is preserved.

The Conservancy appreciates the opportunity to comment. Please direct any questions or future documents to Paul Edelman of our staff at (310) 589-3200 ext. 128 and at the above Ramirez Canyon Park address.

Sincerely,

JEROME C. DANIEL
Chairperson